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December 22, 2005

VIA HAND DELIVERY

Mr. Charles Terreni
Chief Clerk Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Docket No. 2005-270-G: Request for Investigation to Determine Whether a Regulation Should Be Promulgated Requiring Relocation of Certain Meter Sets or Installation of Splash Guards on These Meter Sets

Dear Mr. Terreni:

Enclosed please find an original and 26 copies of the Testimony of Mike Forrester in the docket shown above. Please accept the original and 25 copies for filing and return the additional "file-stamped" copy to my courier.

Thank you for your assistance with this matter. If you have any questions about this filing you may reach me at the number shown above.

Very truly yours,

Kerry B. McTigue *by J. H. H.*

Kerry B. McTigue

KBM:mc
Enclosures

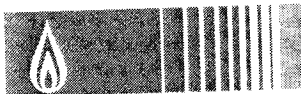
**Before The
Public Service Commission of South Carolina**

Docket No. 2005-270-G

RECEIVED
PUBLIC SERVICE COMMISSION
DECEMBER 22 2005

**Testimony
Of
Mike Forrester

On Behalf Of
Piedmont Natural Gas Company, Inc.**



**Piedmont
Natural Gas
Company**

December 22, 2005

1 **Q. Please state your name and your business address.**

2 A. My name is Mike Forrester. My business address is 501 W. Blackstock
3 Road, Spartanburg, SC 29301.

4 **Q. Mr. Forrester, by whom and in what capacity are you employed?**

5 A. I am employed by Piedmont Natural Gas Company, Inc. (Piedmont). I hold
6 the position of Vice President – SC District Operations.

7 **Q. What is the purpose of your testimony in this proceeding?**

8 A. To describe the position of Piedmont Natural Gas Company, Inc. regarding
9 potential safety issues related to certain residential meter sets in use on
10 Piedmont's system in South Carolina.

11 **Q. Please describe the potential safety issue you are referring to?**

12 A. On September 1, 2005, the South Carolina Office of Regulatory Staff issued
13 a Pipeline Safety Advisory Bulletin to all gas system operators in South
14 Carolina. That advisory bulletin identified a potential vent freeze-up
15 phenomenon that could occur with moisture build-up on certain types of
16 residential meter sets where the regulator vent is positioned directly above
17 the meter. According to the ORS advisory bulletin, in freezing conditions
18 this phenomenon could lead to the inoperability of the regulator and
19 associated over-pressurization of the home piping system. The ORS
20 identified this issue as a result of its investigation of a complaint filed by a
21 customer served by another natural gas local distribution company in South
22 Carolina.

23 **Q. Does Piedmont have any meter sets of the type about which the ORS is**
24 **concerned?**

25 A. Yes. Piedmont has approximately 18,000 residential meter sets in place that
26 are similar to the one investigated by the ORS.

1 **Q. Has Piedmont had any customer complaints or other problems**
2 **associated with regulator inoperability due to vent freeze-up on these**
3 **meter sets?**

4 A. Not to my knowledge. These Meter sets have been in use by Piedmont
5 without problems in all of its service territories in South Carolina since
6 1966. In this regard, I would also note that we just experienced a fairly
7 severe ice storm in our South Carolina service territory and to my knowledge
8 no problems were encountered with vent freeze up on these meters.

9 **Q. What does Piedmont intend to do in response to the ORS' concerns?**

10 A. We have looked at this issue carefully and engaged in several consultations
11 with the ORS regarding this matter, and based on these actions and our own
12 experience, Piedmont believes that the prudent course of action for
13 Piedmont is to install shielding devices on the identified regulator sets,
14 which will mitigate the phenomenon that could occur with moisture build-up
15 that was referenced in the ORS notification. We anticipate that this activity
16 will be completed by the fall of 2007 at a cost of roughly \$187,200.00.

17 **Q. Do you believe this approach is adequate to address this situation?**

18 A. Yes. Given the isolated nature of the single incident upon which the ORS'
19 advisory bulletin was based, and Piedmont's historic lack of problems with
20 these meters, Piedmont believes that installing shielding devices on the
21 schedule we have outlined above is a prudent and reasonable approach to
22 addressing this issue.

23 **Q. What is the ORS' position on this proposal?**

24 A. It is my understanding that the ORS will be filing testimony setting forth its
25 position but I am not aware of any objections by ORS to Piedmont's plan.
26

1 **Q. What action are you asking the Commission to take in this docket?**

2 A. We are asking that the Commission accept Piedmont's proposed solution to
3 the vent freeze-up issue identified by the ORS as described above.

4 **Q. Do you have anything further to add at this time?**

5 A. No.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that five copies of the attached Testimony are being served this date via Hand Delivery upon:

Shannon Bowyer Hudson, Counsel
Office of Regulatory Staff
1441 Main Street
Suite 300
Columbia, South Carolina 29201

And that one copy of the attached Notice is being served this date on the other parties to this proceeding by U.S. Mail addressed as follows:

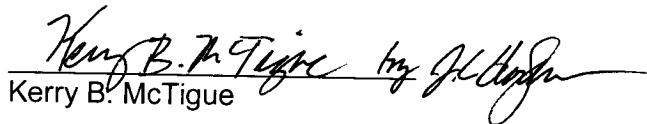
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This the 22nd day of December, 2005


Kerry B. McTigue